### RCRAInfo CM&E EVALUATION - VIOLATION FORM

*EPA ID Number PARCOCKB1849 EIN							
Handler Name FOR PURCIFIC COMPONY The							
Street 3670 G Street							
City Philadelphia State PA Zip Code 19134							
Actual Generator Status  Check only if different from Notified Status.  LQG SQG CESQG Closed Non-Hand	ller 🗍						
Universe Change Required? (Generator Status Change Required)  YES  NO  If YES, complete the Universe Change Section (on reverse side of this for	orm).						
RCRA Non-Notifier? YES NO If YES, complete the Handler Section (on reverse side of this form).							
Other Facility Information Changes? YES NO If YES, complete the Handler Section (on reverse side of this form).							
*EVALUATION Add Update Delete You must provide an Evaluation Identified known as the Sequence Number).	r (also						
*Evaluation *Type	tion						
CEI 11712007 S LAJ WM							
You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.  Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.							
Notes: No VIOS							
Evaluation Indicator Field (Check all that apply)  Citizen Complaint Multimedia Inspection Sampling Not Subtitle C							
Focused Coverage Areas (Use Only for Evaluation Type FCI)   Regulation-Specific FCI							
Does this Evaluation Add/Update/Delete a Violation? YES NO If Yes, fill in the Violations Section(s) on positive form.	page 2						
Does this Evaluation link to a Commitment?  YES NO If Yes, please use the RCRAInfo 3007 Information Requests and Commitments	Form.						
Does this Evaluation link to a 3007 Request?  YES NO If Yes, please use the RCRAInfo 3007 Information Requests and Commitments							
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES . NO If Yes, fill in information be	elow.						
*Regulation Citation *Date Determine *Seq. No. *Violation Type *Agency (Type + Citation) (mm/dd/yyyy)  (ex. FR 262.1)							
	1						

<sup>\*</sup>Required Fields

2500-FM-LRWM0276 Rev. 5/99



## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

nspection Date	1/17/07
Time Start	
Time Finish	

HAZARDOUS WASTE	INSPECTION REPORT
<b>GENERATOR</b>	<b>☒</b> S Q GENERATOR

Cor	mpany name <u>The Purolit</u>	e Company	I.D. Number <u>PAR00031849</u>
Site	Address <u>3620 G Street</u>	<u> </u>	
Cou	unty <u>Philadelphia</u>	Municipality Philadelphia	Zip <u>19134</u>
Nar	me of Inspector <u>Laura Jo</u>	phnson	
Naı	me & Title of Responsibl	e Official Ken Shaner, Environmental Health	and Safety Manager
Per	son Interviewed <u>Ken Sh</u>	aner	Telephone ( <u>610</u> ) <u>668-9090</u>
Ма	iling Address (if different	from above)	
Am	ount of Hazardous Was	te Generated per Month:	PoundsKgs
1.	Site Characterization:		
	STORAGE:	tainer 🔲 Tanks 🔲 Containment Bldg. 🛭	Drip Pad Other
	PBR:	tralization/WWTP	Other
	GENERATOR TREATM	MENT ☐ Containers ☐ Tanks	☐ Containment Bldg. ☐ Drip Pad
2.	Universal Waste:	Large Quantity Handler   ☑ Small Quar	ntity Handler
	Universal Waste Ty	ypes waste lamps, batteries	
3.	Hazardous Waste Tra	nsporters:	
	Transporter Name	Clean Venture Inc.	License Number NJ0000027193
	Transporter Name		License Number
	Transporter Name		License Number
4.	Types of hazardous v	vaste generated and destination facility (le	ocation & type).
•	Waste Code	Waste Description	Destination Facility
	D005	Waste Barium nitrate	Cycle Chem, Inc.
	D001, D028,F003	Waste flammable liquid	550 Industrial Drive
	D002	Waste corrosive liquid	Lewisberry, PA 17339
			PAD067098822

Page \_\_\_\_\_ of \_\_\_\_

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

	Site	Nan	ne <u>Tr</u>	<u>ne Pı</u>	urolite Company ID Number PAR00031849	Date		_
			1	- No	Violation Observed 2 - Not Applicable 3 - Not Determined	4 - Non Co	mpliance	
	ST <i>A</i> 1	TUS 2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
	$\boxtimes$				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
	$\boxtimes$				Identification Number	262a.10	262.12	H002
L	$\boxtimes$				Authorized transporters only	.262a.10	262.12(c)	H003
	Ø				Subsequent notification requirements met	262a.12(b)		H004
	$\boxtimes$				Proper manifest used	262a.10	262.21	H005
	$\boxtimes$				Manifests filled out correctly and completely	262a.20		H006
	$\boxtimes$				Manifests signed and routed properly	262a.23(a)	262.23	H007
					Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	. H008
	$\boxtimes$				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
					SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
		$\boxtimes$			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
					Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
	$\boxtimes$				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
	$\boxtimes$				Specified records retained for three years	262a.10	262.40(c)	H014
		$\boxtimes$			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	$\boxtimes$				Exception reporting procedures followed	262a.42	262.42	H016
	$\boxtimes$				Spill reporting procedures followed	262a.10	262.34(d)	H017
	$\boxtimes$				PPC plan developed and implemented	262a.10	262.34(a)	H018
	$\boxtimes$				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		$\boxtimes$			Source reduction strategy prepared and available (LQG only)	262a.100		H020
	$\boxtimes$				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
- 1			1			1		4

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site	Nam	ie <u>Th</u>	e Pu	rolite Company ID Number	er <u>PAR00031849</u>	Date		
		1	- No '	Violation Observed 2 - Not Applicable	3 - Not Determined	4 - Non Com	pliance	
STA	TUS 2	3_	4	REQUIREMENT	•	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subcha	pter I)			
$\boxtimes$				Containers managed in compliance wit Subpart I and 25 PA Code Chapter 265		262a.10	262.34	H025
$\boxtimes$				Containers of hazardous waste in good	condition	265a.1	265.171	H026
$\boxtimes$				Containers and stored waste compatib	le	265a.1	265.172	H027
$\boxtimes$				Containers kept closed except during a of wastes	addition or removal	265a.1	265.173(a)	H028
$\boxtimes$				Containers managed to prevent leaks		265a.1	265.173(b)	H029
				Container configuration and spacing in management and access for inspection emergency equipment		265a.173		H030
$\boxtimes$				Container storage areas inspected at le	east weekly	265a.1	265.174	H031
$\boxtimes$				Special requirements for ignitable or reincompatible waste complied with	eactive and	265a.1	265.176-177	H032
$\boxtimes$				Proper containment and collection sys	tems in place	265a.179		H033
$\boxtimes$				Air emission standards complied with	(AA, BB, CC)	265a.1	265.178	H034
				Containers clearly marked with accum visible for inspection	úlation date and	262a.10	262.34(a)(2)	H035
$\boxtimes$				Containers labeled "Hazardous Waste	11	262a.10	262.34(a)(3)	H036
				Containers labeled accurately identify	contents	SWMA 6018.403(b)		H037

### Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

Date of Insp	ection _	1/17/2007	Complaint	Number_	PAR000031849	
Company/Faci	lity/sit	e Name_ <u>Th</u>	e Purolite	Company	<b>/</b>	

A small quantity generator inspection of The Purolite Company of 3620 G Street Philadelphia, PA 19134 took place on January 17, 2007 by Laura Johnson from the Department. Ken Shaner, Environmental Health and Safety Manager was the facility guide. The Purolite Company had never been inspected by the Department prior to this inspection. The facility is a manufacturer of ion exchange resins. The facility operates 24 hours a day 7 days a week; with only about 2- three week shut downs in a year. The following observations were observed during the inspection:

- 1. The inspection began with a discussion of the facilities operations. The facility takes monomers and converts them to polymers using a catalyst. Most of the waste that is created is from contaminated water that the facility has a City of Philadelphia Wastewater Discharge Permit for (PUR00010150BD). The discharge water is pH adjusted and monitored monthly for semi volatiles and volatiles.
- 2. A tour of the facility was then taken. The process areas were observed and appear to be kept neatly with no waste issues observed. The isobutyl alcohol condenser was observed. Here the IBA is recycled into the process continually until it is too contaminated to be further used. When the IBA is deemed to be too contaminated it is declared a waste and is shipped out as such. At the time of the inspection there was no waste IBA at the facility. The facility also does not have a hazardous waste storage area, as they regularly do not have waste to store. The facility will be setting up a storage area in the new warehouse they recently purchased. It is advised that the PPC be changed to reflect this new area once it is in use, it should also be noted that once a 180 day storage area is set up a weekly inspection log will need to be maintained.
- 3. The tank room was next observed. Here the facility stores 100% sulfuric acid and oleum. Currently the facility is sending the used sulfuric acid and oleum to a recycler in South Carolina. The spent products are not treated as waste while being store at the facility; they are currently sending approximately one tanker of these spent products out a day (44,000 lbs). The spent acids are stored in tanks which had proper secondary containment. A question arose while

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection.

Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this  $^{\circ}$  report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Faxed to facility	Date 1/2407
Inspector (signature) Alla John	Date 1/22/07
of the state of th	Page 4 of

### Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

Date of Inspection	1/17/2007	Complaint	Number_PAR0000318	19
Company/Facility/Si	te NameTh	e Purolite	Company	

writing this inspection report as to whether the spent acid is in fact exempt from the hazardous waste regulations. After researching the matter with the help of Mr. Shaner it was decided that the spent sulfuric acid is exempt under 40 CFR Section 261a.4(7), the materials should be managed as a residual waste pursuant to Pa Code Title 25 Section 261.a.2 while they are at the facility. This means that the tanks should be labeled and a visual inspection of the tanks should take place on a regular basis with the results being recorded. The sulfuric acid is already sent out with a bill of lading, which is the proper record keeping.

- 4. The quality control labs were then observed. Here very little waste is generated unless there is a chemical cleanout of the lab. No wastes were observed in this area.
- 5. The waste water treatment tanks were observed. These tanks are continuously monitored and pH adjusted as needed. This process appeared to be in good working order and no issues were observed.
- 6. Lastly the paperwork review was conducted. During this review a question arose regarding the facility's management of off-spec copolymers. Historically the facility had been treating these as residual waste, but a new process was implemented where they began selling the copolymers to a cement kiln to be used as fuel. The question was asked if this is to be counted in the facility's residual waste report. After reading the regulations it was found that this process meets the definition of a co-product found in the Residual Waste Regulations of the Title 25 PA Code. The company should ensure that they keep a copy of the contract with the cement kiln for inspection and that the co-product has a BTU value of greater than 5,000BTU/ hour. Mr. Shaner assured this inspector that copolymer has a BTU of around 10,000-15,000. This information should be kept available for inspection. Since this material meets the definition of a co-product it does not need to be recorded in their residual waste reporting, however on the residual waste biennial report there is a box that needs to be checked declaring they use a co-product.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Fayed to facility	Date 1/27/07
Inspector (signature) Was July	Date 1/72/07
	Page $\widetilde{S}$ of $\widehat{Q}$

#### Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

### Inspection Report Comments

Date of Inspection	1/17/2007 Complaint Number P	AR000031849
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This report does r contained herein shall herein.	be deemed to grant or imply immunity	alyses or Department records.  lable action of the Department. Nothing  from legal action for any violation noted  y imply concurrence with the findings on this
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Person interviewe	ed (signature) large H	) Racility Date 1/27/07
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(Name of Carrier)

At 3620 "G" Street, Phila., PA 19134 20 FROM THE PUROLITE COMPANY

No. _ Packages .	Kind of Packago, Description of Articles, Special Marks, and Exceptions	"WEIGHT (Subject to Correction)	Class or Rate	Check Column	Subject to Section 7 of Con- of applicable bill of lading, ohipment is to be delivered
2/3	40 ault Boxes copolymer	- MACIE	) F-1	nes, et	consignee without recourse consignor, the consignor shall the following statement: The carrier shall not make de of this shipment without paym freight and all other lawful ch
ZII .	sacks copolymer - mixed From	CARnets	tur	ned t	(Signature of Consignor.)
,		84.4	k Kog		If charges are to be prepaid, or stamp here, "To be Prepaid."
					TO BE PREPAID
Dυ		40,71	10	eter. E	Received 9 to apply in prepayment of the chr on the property described hereo
ST	SYNTHETIC SILICA, NOI, DENSITY OF 20#/CF OR GREATER NMFC # 176370-3 CLASS 50	ļ	OVALS:	10.1	Agent or Coshier  Per  (The signature here acknowle only the amount prepaid.)
PIOTE - Where	noves between two ports by a carrier by water, the law requires that the bill of lading shell state whether it the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared clared value of the property is hereby specifically stated by the shipper to be not exceeding	is "carrier's or shipper's wa value of the property.	eight."		

The Fibre Boxes used for this shipment conform to the specifications set forth in the box maker's pertificate thereon, and all other requirements of "Item 222 of National Motor Freight Classification". + Shipper's imprint in lieu of stamp; not a part of bill of lading appropriate by the Interstate Commerce Commission.

BILLING ADDRESS:

THE PUROLITE COMPANY 150 Monument Road Bala Cynwyd, PA 19004

ATTACH COPY #2 TO INVOICE

Charges advanced:

armanent postoffice address of shipper.

ין פקני ב characters per inch) in the unshaded areas only

Please refer to the Instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

**&EPA** 

# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use On

Simil .

I. Installation's EPA ID Number (Mark 'X' In the appropriate box)	
A. First Notification (Complete Item C)  C. Installation's EPA ID Number 1	19
II. Name of Installation (Include company and specific site name)	
THE PUROLITE COMPANY	
ill. Location of Installation (Physical address not P.O. Box or Route Number)	
Street	
3620 G STREET	
Street (Continued)	
City or Town State Zip Code	
PHILADELPHIA PA19134-	
County Code County Name	
101PHILADELPHIA	
IV. Installation Mailing Address (See Instructions)	
Street or P.O. Box	
SAME	
City or Town State Zip Code	
V. Installation Contact (Person to be contacted regarding waste activities at site)	. *
Name (Last) (First)	
SACHDEV NARVINDER	11
Job Title Phone Number (Area Code and Number)	
GENERAL MANAGER610-668-9090	
VI. installation Contact Address (See Instructions)	
A. Contract Address Location, Malling, Other  B. Street or P.O. Box	
Location Malling Other B. Street of P.U. Box	
Cocation Malling Other B. Silvest Of P.O. BOX	
City or Town State Zip Code VII. Ownership (See Instructions)	
City or Town State Zip Code  VII. Ownership (See Instructions)  A. Name of installation's Legal Owner	
City or Town  State Zip Code  VII. Ownership (See Instructions)  A. Name of installation's Legal Owner	
City or Town  State Zip Code  VII. Ownership (See Instructions)  A. Name of installation's Legal Owner  BRO-TECH CORPORATION  Street, P.O. Box, of Route Number	
City or Town  State Zip Code  VII. Ownership (See Instructions)  A. Name of installation's Legal Owner  BRO-TECH CORPORATION  Street, P.O. Box, of Route Number	
City or Town  State Zip Code  VII. Ownership (See Instructions)  A. Name of installation's Legal Owner  BRO-TECH CORPORATION  Street, P.O. Box, of Route Number  150 MONUMENT ROAD  City or Town  State Zip Code	
City or Town  State Zip Code  VII. Ownership (See Instructions)  A. Name of installation's Legal Owner  BRO-TECH CORPORATION  Street, P.O. Box, of Route Number  150 MONUMENT ROAD  City or Town  State Zip Code	inged)

	יים וויסיון ווו the unshaded areas only	Form Approved, OMB No. 2050-0028 Exp GSA No. 02
		ID - For Official Use Only
VIII. Type of Regulated Waste Activity (Ma	rk 'X' in the appropriate boxes: Refer to Inst	ructions)
A. Hazardous W	A TOTAL OF THE PARTY OF THE PAR	B. Used Oil Recycling Activiti
	□ 3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity; see Instructions.  4. Hazardous Waste Fuel □ a. Generator Marketing to Burner □ b. Other Marketers □ c. Boiler and/or Industrial Furnace □ 1. Smelter Deferral □ 2. Small Quantity Exemption Indicate Type of Combustion Device(s) □ 1. Utility Boiler □ 2. Industrial Boiler □ 3. Industrial Furnace □ 5. Underground Injection Control	1. Used Oil Fuel Marketer  a. Marketer Directs Shipment of I Oil to Off-Specification Burner b. Marketer Who First Claims the Oil Meets the Specifications 2. Used Oil Burner - Indicate Type( Combustion Device(s) a. Utility Boller b. Industrial Boller c. Industrial Furnace 3. Used Oil Transporter - Indicate Typof Activity(les) a. Transporter b. Transfer Facility 4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(les) a. Process b. Re-refine
IX. Description of Hazardous Wastes <i>(Use</i>	additional sheets if necessary)	Dr. Me-feilite
A. Characteristics of Nonlisted Hazardou nonlisted hazardous wastes your installation	s Wastes. (Mark 'X' in the boxes correspor h handles; See 40 CFR Parts 261.20 - 261.24)	nding to the characteristics of
. Ignitable 2. Corrosive 3. Reactive 4. To (D001) (D002) (D003) CI	nxicity haracteristic (Ust specific EPA hazardous waste nu	mber(s) for the Toxicity characteristic contaminant
3. Listed Hazardous Wastes. (See 40 CFR 2	261.31 - 33; See Instructions If you need to Ils	it more than 12 waste codes.)
1 2	3 4 9 10	5 6 11 12 12 12 12 12 12 12 12 12 12 12 12
C. Other Wastes. (State or other wastes requi	iring a handler to have an I.D. number; See I	nstructions.)
1 2	3 4	5 6
X. Certification		•
I certify under penalty of law that this document system designed to assure that qualified personn or persons who manage the system, or those per best of my knowledge and belief, true, accurate, a including the possibility of fine and imprisonme	el properly gather and evaluate the information sons directly responsible for gathering the intended and complete. I am aware that there are signific	n submitted. Based on my inquiry of the pers formation, the information submitted is, to
Signature Lacumour	Name and Official Title (Type or prin NARVINDER SACHDE GENERAL MANN	Date Signed  Of GER  Date Signed
XI. Comments		,
OFW: Purolite . / changed se	n. status from CEG to	SQG.
BAHlem 10/1/199		
Note: Mail completed form to the appropriate EP	A Regional or State Office. (See Section III of	of the booklet for addresses.)



September 30, 1999

REGION III

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ms. Courtney Miller
U.S. Environmental Protection Agency
Region III
RCRA Program Branch
(3WC22)
1650 Arch Street
Philadelphia, PA 19103-2029

n promision A stable mo

Subject:

Notification of Regulated Waste Activity (EPA Form 8700-12)

Hazardous Waste Change of Generator Status

Dear Ms. Miller:

集制集 主作

The Purolite Company (Purolite) is pleased to provide the U.S. Environmental Protection Agency (EPA) with this revised EPA Form 8700-12 (Notification of Regulated Waste Activity) for its manufacturing facility located at 3620 "G" Street, Philadelphia, Pennsylvania. Purolite is formally changing its hazardous waste generator status, Section VIII, A. Hazardous Waste Activity, Item 1 (Generator), from conditionally exempt small quantity generator (CESQG) to small quantity generator (SQG).

If there are any further questions regarding this subject, please feel free to contact me.

Sincerely,

Narvinder Sachdev General Manager

Enclosure

Purolite/164/9908.2/lrw

CC

W. Kesack, IES

L. Howse, IES

A. Soni, IES

ISO 9002



The Purolite Company, Division of Bro-Tech Corporation 3620 "G" Street, Philadelphia, PA 19134 USA 800-343-1500 • 610-668-9090 • Fax 215-425-7534 www.purolite.com • E-mail at purobala@cwixmail.com



#### ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Biennial Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER .

PAR000031849

10/29/99

PUROLITE CO THE 3620 G ST

PHILADELPHIA , PA 19134 NARVINDER SACHDEV GENL MGR

INSTALLATION ADDRESS

3620 G ST

PHILADELPHIA , PA 19134

EPA Form 8700-12A (1/98)